

Federal Defenders
OF NEW YORK, INC.

Southern District
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December 13, 2016

By ECF

Honorable Edgardo Ramos
United States District Court
40 Foley Square
New York, New York 10007

Re: United States v. El Gammal,
15 Cr. 588 (ER)

Dear Judge Ramos,

We write to request a status conference and a CIPA section 2 proceeding to discuss the following:

1. The defense's December 11, 2016, letter request to modify the protective order governing discovery;
2. The terms of the protective order for the 3500 material;
3. The government's December 9, 2016, CIPA filing which we argue is inappropriately designated as classified.

Security Specialist Harry Rucker is available after 11:00 a.m. on December 15, 2016. Given that we are less than 30 days away from trial, we ask for an appearance before the Court to resolve these matters.

Thank you for your consideration of this request.

Respectfully submitted,

/s/

Shroff, Habib & Miron
Attorneys for Mr. El Gammal

SO ORDERED:

HONORABLE EDGARDO RAMOS
United States District Judge
cc: Government counsel